

April 30, 2021

Hon. Naomi R. Buchwald  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Georgia Ward, 20-CR-633 (NRB)**

Dear Judge Buchwald:

Georgia Ward was arrested on November 18, 2020, and charged with participating in a fraud and aggravated identity theft theme allegedly orchestrated by her co-defendant and ex-boyfriend, Laurell Wells. Ms. Ward was released on a \$50,000 personal recognizance bond, and her travel was restricted to the Southern and Eastern Districts of New York. I write today to respectfully seek a temporary modification of Ms. Ward's travel restrictions.

For a number of years, Georgia Ward has gone on a brief vacation with a group of girlfriends around the time of her birthday in late July. This year, the group wants to take a 5 day trip to a resort in Barbados between July 23 and July 28. As noted, this get-together has been an annual tradition amongst this group of friends.

Ms. Ward is not a flight risk. She has no criminal record, and, more importantly, she has three young children, including a newborn (born in February), who would remain behind with Ms. Ward's mother in the Bronx, and who she certainly has no interest in abandoning. She has abided by her conditions of pretrial release, and if permitted to go, would of course provide Pretrial Services with her travel itinerary. As a result, Pretrial Services takes no position on this request. The government, on the other hand, opposes Ms. Ward's request, but it does so on principle (general opposition to international travel), rather than because of some reason specific to Ms. Ward or her case.

Accordingly, I respectfully request the Court to modify Ms. Ward's conditions of release to permit her to travel to and from Barbados July 23-28, and to direct Pretrial Services to temporarily return Ms. Ward's passport for that purpose.

Thank you very much for your consideration.

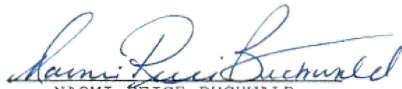
Respectfully submitted,

/s/

Florian Miedel  
*Attorney for Georgia Ward*

cc: All Counsel

Application denied.  
**SO ORDERED.**



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: New York, New York  
May 3, 2021